

STATE OF COLORADO
 Roy Romer, Governor
 DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
 AN EQUAL OPPORTUNITY EMPLOYER
 Perry D. Olson, Director
 6080 Broadway
 Denver, Colorado 80216
 Telephone: (303) 297-1192

REFER TO



*For Wildlife-
 For People*

July 19, 1991

David Simonson
 Department of Energy
 Rocky Flats Office
 P. O. Box 928
 Golden, CO 80402

RE: Comments on Standard Operating Procedures, Ecology 5.0 and 3 Environmental Evaluation Work Plans - Operable Units 1,2, and 5

Dear Mr. Simonson:

District Wildlife Manager Tom Howard and myself have reviewed the above referenced documents as requested in your letter of June 14. Portions of the Standard Operating Procedures were also reviewed by other members of our staff. Here are the comments we have at this time:

Standard Operating Procedures (Ecology) - These data collection procedures seem to be reasonable and pretty much the "industry standard" to accomplish the tasks proposed. We have no problem with their implementation.

Environmental Evaluation Work Plans - These three plans are quite similar in content and scope, so we feel comfortable addressing all three together here. In general, much of the plans deal with quite technical aspects of sampling for various potential pollutants. Neither Tom nor myself are knowledgeable in these areas and we are thus not able to comment on the parts of the plans relating to these subjects. It might be possible to find someone in the Division of Wildlife with more knowledge in these areas and have them review the documents, but I suspect that the comments of the Colorado Department of Health staff may adequately cover these subjects.

With regard to the actual wildlife portion of the plans, we generally think that these are reasonable plans which should result in the gathering of much useful data. We have a few minor comments/corrections:

- In the discussion of black-footed ferrets under the Terrestrial Ecosystems section, we suggest changing the statement "black-footed ferrets are now extinct in the wild" to "black-footed ferrets are thought by many to be extinct in the wild".
- In the Wetlands discussion under the Terrestrial Ecosystems section, the statement is made that "these wetlands currently fall under the jurisdiction of the U. S. Army Corps of Engineers". It is our understanding that the COE only has jurisdiction over filling of wetland areas, not for any other aspect of wetlands.

(continued)

DEPARTMENT OF NATURAL RESOURCES, Hamlet J. Barry, Executive Director
 WILDLIFE COMMISSION, William R. Hegberg, Chairman • Dennis Luttrell, Vice Chairman • Eldon W. Cooper, Secretary
 Felix Chavez, Member • Rebecca L. Frank, Member • Louis F. Swift, Member • George VanDenBerg, Member • Larry M. Wright, Member

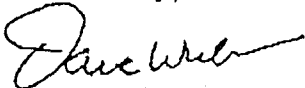
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- In both the Terrestrial Ecosystems section and again in the Environmental Evaluation Tasks section, reference is made to "Protected Wildlife". It is not clear what this term means. Protected from what? By whom? What is really being referred to here?

Both of us are quite new to what is going on at Rocky Flats, so we easily might have overlooked some nuances which could be important. As we gain more of an understanding of the situation we should be able to provide more input.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dave Weber".

Dave Weber
Habitat Biologist

cc: Tom Howard, CDOH
Ron Cattany, DNR
CDOH